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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|------------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA, |) | NO. CR 16-00227-SI-5 |
| |) | |
| Plaintiff, |) | STIPULATION TO CONTINUE HEARING DATE |
| |) | AND TO EXCLUDE TIME; [PROPOSED] ORDER |
| v. |) | |
| |) | |
| BTC-E, A/K/A CANTON BUSINESS |) | |
| CORPORATION, |) | |
| |) | |
| and |) | |
| |) | |
| ALEXANDER VINNIK, |) | |
| |) | |
| Defendants. |) | |

The above-captioned matter is currently set for a status conference on April 14, 2023. The parties have met and conferred and agreed to continue the presently-scheduled hearing to June 2, 2023, at 11 a.m. for a status conference and motion hearing. This continuance is requested because defense

counsel continues to review discovery with the defendant and intends to file a motion to amend the protective order.

It is hereby stipulated by and between counsel for the United States and counsel for the defendant, Alexander Vinnik, that time be excluded under the Speedy Trial Act from April 14, 2023, through June 2, 2023. This time exclusion will allow defense counsel to continue to prepare, including by reviewing the discovery already produced and by preparing his motion papers. For this reason, the parties stipulate and agree that excluding time from April 14, 2023, through June 2, 2023, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from April 14, 2023, through June 2, 2023, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

Undersigned government counsel certify that they have obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

ISMAIL J. RAMSEY
United States Attorney

DATED: April 12, 2023

/s/
CLAUDIA QUIROZ
KATHERINE LLOYD-LOVETT
Assistant United States Attorneys
C. ALDEN PELKER
Trial Attorney, CCIPS Assistant United States Attorney

DATED: April 12, 2023

/s/
DAVID RIZK
Counsel for Defendant ALEXANDER VINNIK

[PROPOSED] ORDER

For the reasons set forth in the stipulation of the parties, the Court CONTINUES this case to June 2, 2023, at 11:00 a.m. for a status conference and motion hearing.

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from April 14, 2023, through June 2, 2023, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time April 14, 2023, through June 2, 2023, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from April 14, 2023, to June 2, 2023, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: _____

HON. SUSAN ILLSTON
United States District Judge